

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**CASE NO. 24-80116-CR-CANNON/McCabe**

**UNITED STATES OF AMERICA**

**vs.**

**RYAN WESLEY ROUTH,**

**Defendant.**

**GOVERNMENT’S REPLY IN SUPPORT OF  
MOTION TO PRECLUDE ALIBI EVIDENCE (ECF120)**

In his Response (ECF 134), Routh finally acknowledges what we have been asking him to agree to for months – he cannot introduce evidence at trial relating to any potential alibi for his whereabouts at Trump International Golf Club from approximately 1:59 AM until 1:31 PM, on September 15, 2024. He agrees that an order to this effect may be entered, so we ask this Court to enter an order stating expressly that Routh cannot introduce evidence at trial relating to any potential alibi for his whereabouts at the golf course from approximately 1:59 AM until 1:31 PM, on September 15, 2024.<sup>1</sup>

Routh nonetheless insists on saying that his position should not be taken as a stipulation that he was at the golf course as alleged. (ECF 134:2). This defies reason. Routh has already stood before this Court to argue that he must be allowed to “live fire” the rifle because it may not have been working when he brought it to the golf course. (*See* ECF 114). His demand for this exercise assumes that he was at the course on September 15. Likewise, in his response to the Government’s motion to admit Rule 404(b) evidence, Routh says he will not object to the

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<sup>1</sup> If Routh seeks to testify at trial, the Court can address then whether he may testify about any supposed alibi, and if so, under what conditions given his prior non-disclosure.

Government's proof that he fled from his "sniper hide" at the golf course after being shot at by the Secret Service agent. (ECF 137:10). If he was not there, how could he have fled?

The Court has directed the parties to engage in a "meaningful" discussion about stipulations to promote a fair and efficient trial. (See ECF 91:7). If the defense will not even stipulate that Routh was at the crime scene on September 15 during the time alleged, despite conceding he has no alibi evidence to present and also making arguments to this Court that necessarily admit his presence there, the prospects for a "meaningful" conferral about stipulations are dim.

Respectfully submitted,

HAYDEN P. O'BYRNE  
UNITED STATES ATTORNEY

By: /s/ John Shipley  
John C. Shipley  
Florida Bar No. 69670  
Christopher B. Browne  
Florida Bar No. 91337  
Maria K. Medetis Long  
Florida Bar No. 1012329  
Assistant United States Attorneys

U.S. Attorney's Office  
Southern District of Florida  
99 Northeast 4th Street, 8th Floor  
Miami, Florida 33132-2111  
Telephone: (305) 961-9111  
E-mail: John.Shipley@usdoj.gov

SUE BAI  
SUPERVISORY OFFICIAL PERFORMING THE  
DUTIES OF THE ASSISTANT ATTORNEY  
GENERAL FOR THE NATIONAL SECURITY  
DIVISION

By: /s/ James Donnelly  
James Donnelly, Trial Attorney  
Court ID No. A5503278  
Department of Justice, National Security Division  
950 Pennsylvania Avenue, NW  
Washington, DC 20530  
Telephone: (202) 514-0849

**CERTIFICATE OF SERVICE**

The Government filed the foregoing document with the Clerk of the Court using CM/ECF  
on April 28, 2025.

/s/ John C. Shipley  
Assistant United States Attorney